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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PG&E CORPORATION, PACIFIC
GAS AND ELECTRIC COMPANY,

Reorganized Debtors,

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**JOINDER OF THE MINNESOTA STATE BOARD OF INVESTMENT IN LEAD
PLAINTIFF PERA AND THE SECURITIES ACT PLAINTIFFS' RESPONSE AND
OPPOSITION TO THE REORGANIZED DEBTORS' THIRTY-THIRD SECURITIES
OMNIBUS CLAIMS OBJECTION**

1 The Minnesota State Board of Investment (“MSBI”) hereby submits this joinder (the
2 “Joinder”) in Lead Plaintiff PERA and the Securities Act Plaintiffs’ Response and Opposition to
3 the Reorganized Debtors’ Thirty-Third Securities Omnibus Claims Objection (ECF No. 14342)
4 (the “Opposition”). In support hereof, MSBI states as follows:

5 BACKGROUND

6 1. MSBI is a Securities Claimant that timely filed proofs of claim against PG&E
7 Corporation (“PG&E”) and Pacific Gas and Electric Company (“Pacific Gas”) in accordance with
8 the Extended Bar Date Order. Specifically, MSBI timely filed Claim No. 101042 against PG&E
9 and Claim No. 101117 against Pacific Gas. On October 11, 2023, MSBI filed amendments to
10 Claim Nos. 101042 and 101117 adopting the allegations in the Third Amended Consolidated
11 Class Action Complaint for the Violation of the Federal Securities Laws (ECF No. 121) filed in
12 *In re PG&E Corp. Sec. Litig.*, No. 3:18-cv-03509 (N.D. Cal.) (the “PERA Complaint”), except
13 the PERA Complaint’s allegations concerning the plaintiffs in that action (Claim Nos. 110026
14 and 110027, respectively).

15 2. On December 13, 2023, the Debtors filed the 33rd Omnibus Claim Objection (the
16 “Objection”) [Dkt. No. 14200], which seeks dismissal of the claims filed by numerous Securities
17 Claimants including MSBI.

18 3. The factual and legal elements of Securities Claimants’ claims, such as the falsity
19 of Debtors’ statements, the scienter of Debtors and their officers in making those statements,
20 whether Debtors’ false statements caused the Securities Claimants’ damages, and the amount of
21 damages per share of PG&E common stock, are common to all Securities Claimants.

22 JOINDER

23 4. For the foregoing reasons and the reasons set forth in the Opposition, MSBI hereby
24 joins in all of the arguments contained in the Opposition in all respects, and adopts and incorporates
25 them herein by reference.

26 CONCLUSION

27 5. For the reasons set forth herein and in the Opposition, MSBI joins in the Opposition
28 and asks that this Court enter an Order denying the Objection.

1 Dated: March 15, 2024

Respectfully submitted,

2 **BERNSTEIN LITOWITZ BERGER**
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4 By: /s/ Jonathan D. Uslaner

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